

# **EXHIBIT 3**

STATE OF INDIANA  
COUNTY OF PUTNAM  
MELISSA TURNER  
Plaintiff,  
vs.  
RENT-A-CENTER, INC.  
Defendant.

) PUTNAM CIRCUIT COURT  
) SS:  
) CAUSE NO.:  
) 67C01-1010CT559  
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FILED

OCT 26 2010

*Marty G. Watts*  
CLERK PUTNAM CIRCUIT COURT

**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff Melissa Turner ("Turner"), by counsel, Tae Sture, for her complaint against the Defendant, Rent-A-Center, Inc. ("RAC"), respectfully submits to the Court and alleges as follows:

**NATURE OF THE ACTION**

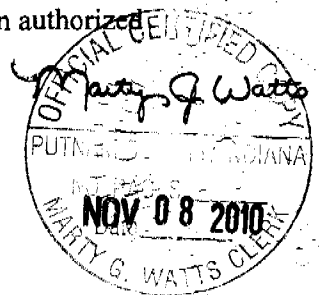
This is an action for damages and to redress the harm caused by Defendant RAC's violation of Indiana's Blacklisting Statute, Ind. Code 22-5-3-2.

**JURISDICTION AND VENUE**

1. The Court has subject matter jurisdiction to decide this claim.
2. This Court also has personal jurisdiction over the Defendants.

**PARTIES**

3. Plaintiff Turner resides in Putnam County, Indiana.
4. Defendant RAC does business in Putnam County, Indiana.
5. Laura Reamer at all times relevant was a store manager for RAC and therefore an authorized agent of RAC.



6. All actions which formed the basis of the claims asserted in this Complaint originated in Indiana.
7. Plaintiff, Melissa Turner, is a United States citizen and was at all relevant times residing in Indiana. Plaintiff was employed by RAC from March 6, 2010 until August 5, 2010.
8. Defendant, RAC, is a corporation doing business in Indiana.

#### **FACTS**

9. Plaintiff incorporates by reference paragraphs 1-8 above.
10. Plaintiff, Melissa Turner, was hired by RAC on or about March 6, 2010, as a Customer Account Representative in their Greencastle store.
11. On or about August 5, 2010, RAC terminated Turner's employment.
12. On or about August 7, 2010, Turner applied for a job at Aaron's, Inc., another rental store.

#### **BLACKLISTING**

13. Plaintiff incorporates by reference paragraphs 1-12 above.
14. After Turner applied for the job at Aaron's, Inc., Turner interviewed with Brad Tharp, store manager for the Greencastle Aaron's store.
15. In or around August 2010, after Turner had applied for employment with Aaron's, Inc., Laura Reamer, an RAC employee and manager, spoke with Brad the manager at the Aaron's Greencastle store.
16. Laura Reamer told Brad that Turner was a troublemaker and if it were up to her (Laura), she would not hire Turner, or words to that effect.
17. RAC violated Indiana's anti-blacklisting statute, IC 22-5-3-2, by wrongfully mischaracterizing Turner as a "trouble maker," thereby inducing Aaron's to not hire Turner.
18. As a result of RAC's black-listing activity, Aaron's did not hire Turner.

**REQUESTED RELIEF**

WHEREFORE, Plaintiff, Melissa Turner, by counsel respectfully requests the Court enter judgment in her favor and award her relief:

- a. Consequential pecuniary damages, including back pay and compensatory damages;
- b. Exemplary damages;
- c. All costs and reasonable attorney's fees;
- d. Injunction against Defendants from further black-listing Plaintiff;
- e. Injunctive relief requiring RAC, its agents, principals, and employees, to limit their reference statements regarding Plaintiff to the period of her employment and tasks performed;
- f. Pre and post-judgment interest on all amounts recoverable; and
- g. All other legal and/or equitable relief the Court sees fit to award.

**DEMAND FOR JURY TRIAL**

Plaintiff, by counsel, demands a trial by jury on all issues so triable.

Respectfully submitted,



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